

Martin Clift  
April 23, 1997  
Page 2

The attachments included with this letter have been developed to address your concerns. In summary, the source of the ARMIS data used in the calculations is FCC Report 43-08, ARMIS Operating Data Report, Table IV - Telephone Calls. A copy of the table is attached (Attachment A). The local messages identified in the report consist of completed and non-completed traffic. Attachment B, State of Michigan Jurisdictional Split Calculation, provides a summary of the total local, intralata, and interstate messages and supporting calculations that reconcile the total messages to total terminated minutes only. The reconciled minutes are factored into the summary of the INP compensation proposal included in Attachment C.

Ameritech is prepared to process payment for the remaining terminating traffic associated with the INP traffic based on the INP terminating compensation rate methodology identified in the Agreement. Please review the attached proposal and supporting data and let me know if you have any additional questions. The ported number percentage factor that you feel reflects Brooks Fiber's local service characteristics has not been considered in the proposal and will have to be provided by Brooks Fiber. If we can agree on the use of the methodology and supporting data, Ameritech can process the INP related charges at issue without delay.

If this methodology is not acceptable to Brooks Fiber, per the terms of the Agreement, a different methodology may be adopted, if agreed to by both parties. If Brooks Fiber has an alternative methodology to propose, we welcome the opportunity to jointly review the methodology.

I would like to set-up a conference call on Friday, April 25th, with Kay Heltaley and myself to further discuss this matter you. Should you have any questions before then, please feel free to call.



cc: Kay Heltaley  
Dennis Perkins

FCC Report 43-86  
 LANS OPERATING DATA REPORT  
 PERIOD: Jan 1986 to Dec 1986  
 COMPANY: Michigan Bell  
 STUDY AREA: Michigan  
 COSA: MBBB

Approved by OMB  
 2000-0000  
 Expires 02/28/00  
 UNRESTRICTED VERSION  
 SUBMISSION 1  
 TABLE IV

TABLE IV - TELEPHONE CALLS  
 (Amounts in Thousands)

Row No.	State or Terr (cc)	Code (cc)	Local Calls (cc)	InterLATA Terminated Calls (cc)	InterLATA Termination Completed (Originating)			InterLATA Billed Access Minutes (Originating and Terminating)		
					Interstate (cc)	Intrastate (cc)	Total (cc)	Interstate (cc)	Intrastate (cc)	Total (cc)
0000	Michigan	MI	14,848,888	1,487,838	1,382,421	713,963	2,096,373	10,467,881	6,568,863	17,036,744
0010	Total	TOT	14,848,888	1,487,838	1,382,421	713,963	2,096,373	10,467,881	6,568,863	17,036,744

**Attachment B  
State of Michigan  
Jurisdictional Split Calculation**

**A. Source:**

1. PCC Report 43-08 Table IV (See Attachment A)
2. Study Area: State of Michigan

**B. Local Calls**

1. Column (ec) reflect total local calls
2. Completed and non-completed calls (original and terminated)
3. Approximately 55% of attempted calls are complete
4. For the calls completed, the average minute of use per message is 3.28 minutes per message (based on AIT cost data filed with M.P.S.C.).

14,846,590.00	Local messages
(x) .55	Percent calls completed
8,165,624.50	Local Messages completed
(x) 3.28	Average minutes per messages
26,783,248.36	Total Term Local Minutes

**C. IntraLATA Toll Calls (Intrastate/IntraLATA)**

1. Column (ed) reflects total toll calls completed (originating)
2. Ameritech's average minute per message for IntraLATA Toll Calls is 4.29 minute per message (based on cost data filed with the M.P.S.C.)

1,407,830	IntraLATA Toll Messages Completed
(x) 4.29	Average minute per message
6,039,509.7	Total Term IntraLATA Toll Minutes

**D. State Access (Intrastate/InterLATA)**

1. Column (ei) reflects total billed access minutes (original and term).
2. The access originating/terminating factor for the total traffic is 1:1

$$6,585,262 / 2 = 3,292,631$$

**E. Interstate Access**

1. Column (eh) reflects total billed access minutes (original and terminating)
2. The access terminating/originating factor for the total traffic is 1:1

$$10,467,591 / 2 = 5,233,795.5$$

**Attachment C**  
**Ameritech Interim Number Portability Compensation Proposal for Brooks Fiber**

**I. Percentage of Numbers Ported as Percentage of Brooks Fiber Numbers in Service = 46%**

**II. Access Rate Elements**

	Intrastate	Interstate
CCL	\$0.005922	\$0.006558
1/2 of Local Transport Facility	\$0.000100	\$0.000100
1/2 of Local Transport Termination	\$0.007159	\$0.007117
Local Switching	\$0.000114	\$0.000113
RIC	<u>\$0.008644</u>	<u>\$0.008644</u>
Total:	\$0.021939	\$0.022532

**III. Total Minutes**

Local Minutes	26,783,248	(64.8%)
Intrastate Toll Minutes (6,039,591 + 3,292,631)	9,332,222	(22.5%)
Interstate Minutes	<u>5,233,796</u>	<u>(12.7%)</u>
Total:	41,349,266	(100%)

**IV. NP Weighted Rate per MOU**

	Traffic %		MOU Rate	Weighted Rate
Local:	.648 (64.8%)	X	\$ 0.015000	= \$ 0.009720
Intrastate Toll:	.225 (22.5%)	X	\$ 0.021939	= \$ 0.004936
Interstate:	.127 (12.7%)	X	\$ 0.022532	= \$ <u>0.002862</u>
Weighted Rate Total:				\$ 0.017518
Less: Local Reciprocal Compensation Rate				\$ <u>0.015000</u>
INP Weighted Average Terminating Compensation Rate				\$ <u>0.002518</u>





TO: Gary Miltner, Brooks Fiber Communications      Via Fax: 616-224-5100  
FROM: Eric Larsen, Ameritech  
SUBJECT: City of Grand Rapids Cutover

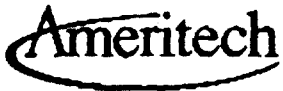
Following is a summary of the questions/concerns we would like to discuss during our conference call today:

1. What is the scheduled time of the cut?
2. Will the ported numbers be cutover in a specific order? Departments? Locations?
3. How will the ported numbers be tested? Individually? Groups? If groups, how large will the groups be? If there are additional paths associated with a ported number, how will all the paths be tested?
4. Will all the numbers be ported on 5/10/96? How much time has been budgeted for the porting and testing of each number?
5. Will new CPE equipment be installed at the City of Grand Rapids? If so, when will the equipment be installed? If the equipment is installed prior to the cutover, is it possible to port over a few numbers to test the entire ported number transaction from Ameritech to Brooks to the end user?
6. Are there critical numbers that have to be ported over immediately?
7. Is there a contingency plan? The numbers that will be ported over are associated with Centrex lines. A ported Centrex number requires the removal of the entire service from the Centrex common block. Should a Centrex line(s) need to be reinstalled in the event of a contingency, the entire service will have to be reinstalled in the Centrex common block. Contingency plans and the amount of time associated with the reinstallation of Centrex lines need to be discussed.

The dial-in number for the conference bridge is 312-627-7000 and is reserved under my name. Please call me at 312-335-6764 should you need to reach me prior to the conference.

5/1 cc: Ray Thomas, Ameritech  
Jerry Hiley, Ameritech





June 25, 1996

Brook Fiber Communications  
Attn: Ms. Mary Jo Lepard  
2855 Oak Industrial Drive N.E.  
Grand Rapids, MI 49506

Dear Ms. Lepard:

Re: City of East Grand Rapid Conversion

In the processing of your request to convert the City of East Grand Rapids to Brooks Fiber Communications, it has come to our attention that five items need clarification.

As with all accounts that are not being fully converted, the Information Industry Service Center contacted the Ameritech Business Unit that currently services the account - in this case, Enhanced Business Services - to arrange the billing of services remaining with Ameritech.

As a result of this process, circuits 616-949-7010, 616-949-4530, and 616-949-1740 that were originally requested to be ported, will remain with Ameritech per the customer's verbal request.

In addition, 616-940-4853 and 616-940-4873 have been requested to be ported to Brooks Fiber Communications.

As the Letter of Agency does not address specific line numbers, the customer's verbal confirmation to leave the three circuits with Ameritech will be accepted. The two additional numbers can be processed at your request.

  
Kim Hadley  
Manager - Unbundling

KH:jg

cc:  
Jim Styf  
Eric Larson  
Jason DeJongh



5B

## BUSINESS

Tuesday  
★ April 22, 1997

## New company wants your call

By A.J. Evenson  
Lansing State Journal

A second provider of local telephone service is operating in Lansing, giving Ameritech its first significant competition.

Brooks Fiber Communications, which promises businesses and residential customers a 20 percent to 30 percent saving on local service, has set up a network of fiber optics.

A news conference announcing the St. Louis, Mo.-based company's Lansing operation is set for today.

The company will focus on voice, video and data services for businesses. It will provide those services to residential customers as well, said Anne Whitehouse, product and marketing manager.

Unlike many of Ameritech's current competitors, who use Ameritech's telephone networks to provide service to their own customers, Brooks Fiber Communication owns and installs its own fiber optics.

That improves customer service by allowing Brooks' own technicians to respond to repair needs, Whitehouse said.

The 2-year-old company was established just as the Telecommunications Act of 1996 opened the door for competition in the local tele-

## The details

Brooks Fiber Communications has introduced local telephone service in Lansing.

■ **Installation:** Brooks will focus on commercial service, but also will offer residential service. Switching to Brooks would not require number changes or, in most cases, rewiring. There is no charge for installation.

■ **Phone:** 318-8000

■ **Address:** 215 S. Washington Square, Suite 100, Lansing

phone industry.

Brooks already operates in other states, including California, Ohio, New Mexico, Connecticut, Oklahoma and Arizona.

Its Michigan operations include Holland, Traverse City and Grand Rapids. It plans to expand into Ann Arbor and Battle Creek/Kalamazoo.

In Grand Rapids, Brooks has captured 9 percent of the market in one year, Whitehouse said.

"The switch is almost seamless," Whitehouse said.

Customers who switch aren't required to change their phone num-

bers. Nor is there typically a need for rewiring. There is no cost to switch and installation is free, though the process can take several weeks.

"It was easy," said Joe Pandey, general manager of the Lansing Board of Water and Light, which became one of Brooks' first commercial customers in Lansing a couple weeks ago. "It happened on a weekend, and we've been up on Brooks for several weeks without any problems I'm aware of."

Few changes are required as a result of the switch, Pandey said. Inside extensions now require dialing four numbers instead of three.

"The quality was there and the price was competitive," Pandey said. It's too soon to tell what the actual savings will be.

Ameritech officials say they welcome Brooks' presence.

"Ameritech has been an advocate of competition for years," spokeswoman Sara Snyder said. Ameritech, which provides only local service, hopes to offer long-distance soon.

And price?

"Ameritech's position has never been that we will be the low-cost provider," Snyder said. "We look to be the high-value provider."

## AT&amp;T hangs up its check-writing habits

Associated Press

NEW YORK — Its bottom line battered by the telephone wars, AT&T Corp. is changing how it reaches out and touches potential customers.

In a push to dissuade people from abusing its generosity, the conglomerate is writing fewer checks to first-time customers. Instead, it's giving away 250 free minutes of calls a month for six months.

The shift away from the checks, which can reach \$100, may not sit well with fans of free money. But the cheaper come-on cheered analysts on Monday as AT&T reported a 24-percent drop in first-quarter profits — weakened by cutthroat rivalry for customers as well as \$1 billion in new investments.

"We're seeing what we feel is a glimmer of hope in the consumer side," said Stephanie Comfort, an analyst at Morgan Stanley & Co.

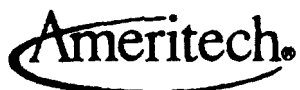
The new promotion is not necessarily cheaper. But AT&T wants to cut down on consumers who sign up to get the free money and then promptly switch to a rival carrier.

The nation's biggest long-distance company said it earned \$1.12 billion, or 69 cents a share, in the three months ended March 31. Besides writing fewer checks to lure new customers, AT&T also has stopped offering freebies to 1.7 million customers who are known "spinners" — people who have changed carriers more than three times in a year.

The idea is that free phone calls will convince people to stay with AT&T without costing actual cash. In addition, AT&T is rewarding free minutes to customers who stay with it for a long time.

"Minutes aren't just a substitute for checks, they are a down payment for customer loyalty," AT&T controller Maureen Tart said.





330 North Orleans  
Floor 3  
Chicago, IL 60654  
Office 312/335-6764  
Fax 312/335-2927

Eric Larsen  
Account Manager

March 17, 1997

Via Facsimile: 616-224-5110

Mr. Jason Dejongh  
Brooks Fiber Communications  
2855 Oak Industrial Drive NE  
Grand Rapids, Michigan 49506

Dear Jason:

As we discussed, Ameritech would like to coordinate test trials with Brooks Fiber on the ported number cutover procedure you submitted to Ameritech for consideration.

We would like to test trial two or three cutovers with Brooks Fiber to evaluate the procedure in real-time cutover situations. To simplify the Ameritech test trial training process, we would like the cutovers to be concentrated in the same Ameritech central office.

We are currently in the process of developing additional methods and procedures for the test trial in anticipation of Brooks Fiber providing Ameritech two or three test trial cutovers. We anticipate this process to take two weeks to complete. As a result, test trials could possibly be scheduled as early as the first week in April.

Please call me once you have had the opportunity to identify the test trial situations. Should you have any additional questions, please feel free to call me. I can be reached at 312-335-6764.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eric Larsen".

Eric Larsen  
Account Manager

MAR 17 1997

## EXHIBIT 22.1

**MULTI LINE HUNT GROUP**  
Cutover procedure

- I    A. Determine number of terminals to cut in 1st stage.  
      B. AMERITECH initiates a Queued INB command for each of the hunt terminals identified as Stage 1.  
      C. BROOKS places a MB status on all lines not in Stage 1.  
         (after traffic clears from Stage 1 terminals, proceed to step II)
- II   A. AMERITECH cut and lays all Stage 1 MDF jumpers.  
      B. BROOKS tests all Stage 1 loops at customer premises.
- III A. AMERITECH places Call Forward option against Pilot of Hunt Group, activated to the new DN of Brook's Hunt Group.  
      (after traffic clears from Stage 2 terminals proceed to step IV)
- IV   A. AMERITECH cut and lays all Stage 2 MDF jumpers.  
      B. AMERITECH Deletes translations for all terminals of hunt group leaving only the 1st line with Pilot DN.  
      C. BROOKS tests and RTS (turns up to service) Stage 2 terminals.
- V    A. AMERITECH places INB status on main line of Hunt Group with Pilot DN, then remove CFW option.  
      B. AMERITECH removes translations on main line of Hunt Group and re-translates number as a Remote Call Forward service to Brook's new DN.  
      C. BROOKS places test calls verifying RCF call size.

by dis





Page 1  
Date: 04/04/97  
Time: 11:35:19  
Fax: 312-335-7461

Kathleen C. Amro  
Director  
Product Development Group

April 4, 1997

Dear Customer:

In our ongoing effort to make it easy to do business with Ameritech Information Industry Services (AIIS), we are pleased to introduce our new and improved Reseller Web Site, [www.ameritech.com/reseller](http://www.ameritech.com/reseller). Whether you are a Resale or Unbundling customer, you now have a venue in which to access up-to-date information enabling you to:

- Understand our product and service offerings.
- Order and provision products and services.
- Understand and implement our Electronic Service Ordering System.
- Monitor updates to our product and documentation offerings.

The [ameritech.com/reseller](http://www.ameritech.com/reseller) web site will now be your source for the following guides, giving you the option to keep them electronically or downloading them for hard copies:

- Resale Product and Services Guide
- Resale Product Guide
- Resale Services Ordering Guide
- Unbundled Services Ordering Guide
- Electronic Services Ordering Guide Version 3.3

We will offer up-to-date information regarding these documents only through this web site, as it provides the most expeditious way to communicate changes. To ensure your understanding of our process, we have included the following documents detailing how and when updates, revisions and notifications will be communicated:

- Electronic Services Ordering Guide Version 3.3. Modification and Change Summary
- User Documentation Update Process
- OSS Interface Change Management Process

To request access to this information at [www.ameritech.com/reseller](http://www.ameritech.com/reseller), please complete the enclosed *Request for Password Form* and fax it to Ameritech at 312-335-7461. You will receive your company's username and password within 72 business hours upon receipt of the completed form.

If you already have a password ID for [www.ameritech.com/reseller](http://www.ameritech.com/reseller), please complete and fax the enclosed form to ensure your continued access to this important information.

We welcome your feedback on how to improve the [ameritech.com/reseller](http://www.ameritech.com/reseller) web site to suit your needs. Please share your comments and/or suggestions with your account manager or electronically submit them as indicated on our web site.

Sincerely,

Kathleen C. Amro

enc.

**Ameritech Information  
Industry Services (AIIS)  
Reseller Web Site  
Password Request  
(External Form)**

**How to complete this form:**

1. Customer contact\* completes Sections 1 and 2.
2. Customer contact signs request (Section 3).

**How to process this form:**

Customer contact will fax request to: 312-335-7461

Located at:  
AIIS  
Marketing Communications  
350 North Orleans, Fl. 3  
Chicago, IL 60654

Questions: 312-335-6511

*Note: Your company's username and password will be issued within 72 business hours upon receipt of this request form.*

\* Single point of contact at your company responsible for AIIS Reseller Web Site Username and Password Management.

**Ameritech**

**Information Industry Services**

Ameritech reserves the right to change username and password as it deems necessary

**SECTION 1 Reason for Completing this Form**

- ☐ New account      ☐ Changes to existing account  
☐ Delete account

**SECTION 2 Customer Contact\* Information**

Request Date \_\_\_\_\_  
Name \_\_\_\_\_  
Title \_\_\_\_\_  
Company Name \_\_\_\_\_  
Street \_\_\_\_\_  
City/State/Zip \_\_\_\_\_  
Phone Number \_\_\_\_\_  
Fax \_\_\_\_\_  
E-Mail \_\_\_\_\_  
Account Manager \_\_\_\_\_

**SECTION 3 Customer Contact Agreement**

I understand this account is to be used exclusively by my company for Ameritech business purposes. As my company's contact person, I am accountable for monitoring it's confidentiality and limiting distribution only to those with a to need access.

Applicant Signature \_\_\_\_\_  
Date \_\_\_\_\_

**SECTION 4 For AIIS MarCom Use Only**

Account Setup:  
Username: \_\_\_\_\_ Password: \_\_\_\_\_  
Established: \_\_\_\_\_  
Customer Notification issued: \_\_\_\_\_  
Follow-up: \_\_\_\_\_  
Comments: \_\_\_\_\_

11-11-13

From (please print) **1720-9477-5**  
Date **April 4, 1997** Sender's FedEx Account Number

720-9477-5

Page: (312) 335-651

**Dr. J. Lee Smith**

S. Tower 3rd fl

IL 60654

more water

066-7571171

**Order the Best of Both Worlds**

22

MI 49506

**For Saturday Delivery check here**

[illegible]

—

三、

Mr. Lloyd C. D.

1. *What is the purpose of the study?*

Dr. David L. B. 173

720-9477-5

PAGE: 1312, 335-651

S. Tower 3rd fl

IL 206065-4

2006-05-11 11:11  
Jettie Jones

Phone: 017-9860000  
Department: Sales & Marketing

25

MI 49506

சென்னை நகரில் உள்ள பழைய கட்டிடம் ஒன்றைப் பயன்படுத்தி அமைக்கப்பட்டிருக்கும் இவ்விருப்பத்தின் மூலக்கோவைகள் பின்வருமாறு:

and looking at statistics of the past people have been able to predict a lot of things that have happened in the future. So, I think that's a good thing to know. And I think that's a good thing to know. And I think that's a good thing to know.

4/7/97  
9:29 am.  
M. FLIKKEMA





Room 1750  
Detroit, MI 48226  
Office: 313-223-8033  
Fax: 313-496-9326

Craig A. Anderson  
Counsel

May 30, 1997

Mr. Todd J. Stein  
Brooks Fiber Communications  
2855 Oak Industrial Drive, NE  
Grand Rapids, MI 49506

Dear Mr. Stein:

At the recent OSS hearing before the Michigan Public Service Commission on May 28, 1997, you represented that Brooks Fiber had not yet received access to and was unaware of the voluminous information Ameritech Michigan has made available regarding the use of the company's OSS interfaces. (See transcript from that hearing, pp. 262-263.) If you recall, binders containing that information were stacked on top of the table immediately behind our presenters at the hearing. Those binders included Volumes I, II, III, and IV of the Resale Services Ordering Guides and the one volume Electronic Services Ordering Guide. As was mentioned at the hearing, all of this information - and more - has been put on a WEB site for easy access.

Contrary to your assertion at that hearing, access to this information has previously been made available to Brooks Fiber.

Attached for your information is a copy of an April 4, 1997 letter Ameritech sent to Brooks Fiber, among others, advising your company of the availability of this information and explaining exactly how to obtain access to it. Because this information is proprietary, this April 4 letter also included a password request form that Brooks Fiber could fill out and return to Ameritech in order to gain access to the secure WEB site. Attached to this letter is a copy of the Federal Express air bill to Brooks Fiber for our April 4 letter (tracking number 4592269496) and a sheet indicating receipt by Brooks Fiber on "4/7/97 9:29 am. [by] M. Flikkema."

I should also clarify that those user guides available on the WEB site to all CLECs, including Brooks Fiber, are in addition to the detailed specifications enabling requesting carriers to build to Ameritech's OSS interfaces which were previously made available to all CLECs prior to January 1, 1997. For specific publication dates of each interface specification, see Ameritech Michigan's May 28,

Mr. Todd J. Stein

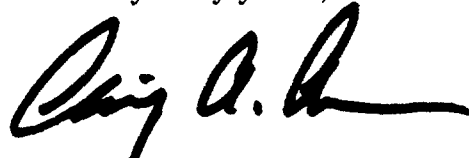
May 30, 1997

Page 2

1997 response to the Commission's eight questions regarding OSS; specifically, Response No. 2, which was provided to you at the hearing.

If your client would like to have any additional information about how to access the information on our WEB site, please feel free to call Brooks Fiber's account manager, Kay Heltsley, on (810) 948-0375.

Very truly yours,

A handwritten signature in black ink, appearing to read "Craig A. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Craig A. Anderson

Attachments

cc: Mr. William Celio  
Ms. Kay Heltsley  
Mr. Paul La Schiazza  
Mr. Warren Mickens

CAA:jkt